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6759-AG08-0912-255

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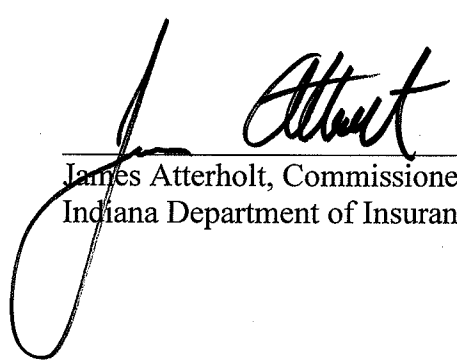
The Commissioner, after reviewing the Agreed Entry (attached hereto as exhibit A), finds it has been entered into fairly and without fraud, duress or undue influence, and is fair and equitable between the parties. The Commissioner hereby incorporates the Agreed Entry as if fully set forth herein, and approves and adopts in full the Agreed Entry as a resolution of this matter.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Commissioner
of Insurance:

1. The Statement of Charges filed against the Respondent and referenced in the Agreed Entry is hereby dismissed without prejudice.
2. Respondent shall pay an administrative fine to the Department in the amount of twenty eight thousand dollars (\$28,000.00). Respondent shall pay the first ten thousand dollars (\$10,000.00) to the Department within thirty (30) days of the filing of this final order. Respondent shall pay the remaining amount in twelve (12) consecutive, monthly payments in the amount of one thousand five hundred dollars (\$1,500.00) to the Department thirty (30) days after the previous payment.
3. The Department shall have the right to audit Respondent's files at Respondent's expense pursuant to Indiana Code section 27-1-3.1 et seq.
4. Respondent shall provide the Department with four (4) quarterly reports summarizing the annuity business transacted by Respondent in the manner set forth in the Agreed Entry. The first quarterly report will be provided to the Department on January 1, 2009. Each subsequent report will be provided at least ninety (90) days following the previous report.
5. Respondent shall provide the Department with twelve (12) consecutive monthly reports summarizing all the senior seminars conducted by Respondent and/or Vineyard Financial in the manner set forth in the

Agreed Entry. The first report will be due on January 1, 2009. Each subsequent report will be due thirty (30) days after the previous report.

ALL OF WHICH IS ORDERED this 27 day of October, 2008



James Atterholt, Commissioner
Indiana Department of Insurance

Distribution:

Lisa Harpenau
Indiana Department of Insurance
311 W. Washington Street, Suite 300
Indianapolis, Indiana 46204
Counsel for Department

Stephen Sutherlin
Stewart & Irwin, P.C.
251 E. Ohio Street
Indianapolis, Indiana 46204
Attorney for Respondent

) SS:

CAUSE NO: 3333-AG07-1105-286
6066-AG07-1105-287
5753-AG07-1105-288
6320-AG08-0912-254
6759-AG08-0912-255

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STATE OF INDIANA
DEPT. OF INSURANCE

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WHEREAS, since the Statement of Charges, the Department has received two additional complaints against Respondent;

WHEREAS, all complaints received by the Department against Respondent alleged that Respondent sold annuity products and misrepresented the terms of the contracts;

WHEREAS, the Respondent filed an affidavit that denied the misrepresentation charges;

WHEREAS, after an investigation by the Department, the Respondent voluntarily reported he sold approximately one hundred twenty (120) unapproved annuity products in the State of Indiana which were issued by Allianz Life Insurance Company of North America;

WHEREAS, the Respondent voluntarily reported affidavits that misrepresented where the applications were signed with respect to the contracts relating to the unapproved products;

WHEREAS, the Respondent reported some clients executed certain "Contract State Declaration" forms which misrepresented where the products were solicited;

WHEREAS, the Respondent neither admits nor denies any of the alleged violations, but wants to resolve the issues with the Department;

WHEREAS, the Department and the Respondent intend to resolve all matters contained in the above referenced cause numbers by executing this Agreed Entry;

WHEREAS, the Department and the Respondent intend that this Agreed Entry be executed in lieu of a final administrative hearing on the matters referenced herein;

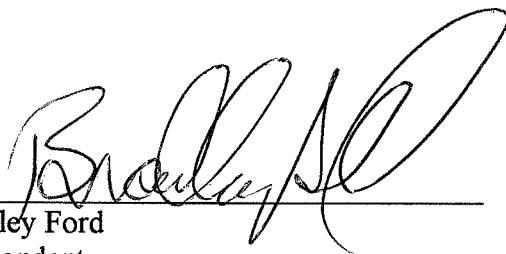
IT IS THEREFORE, NOW AGREED by and between the parties as follows:

1. The Commissioner of Insurance has jurisdiction over the subject matter of, and the parties to this administrative proceeding.
2. This Agreed Entry is executed voluntarily by the parties.

3. Respondent voluntarily and freely waives his right to a public hearing on the issues in the above referenced cause numbers.
4. The Department will dismiss the Statement of Charges filed against Respondent on November 16, 2007, and will dismiss the additional two complaints referenced herein.
5. Respondent agrees to pay an administrative fine in the amount of twenty eight thousand dollars (\$28,000.00) to the Department. The first payment of ten thousand dollars (\$10,000.00) will be made within thirty (30) days of the final order. The remaining fine amount will be paid in twelve (12) consecutive, monthly installments of one thousand five hundred dollars (\$1,500.00) each due thirty (30) days after the previous payment.
6. Respondent agrees that the Department has the right to audit Respondent's files at Respondent's expense pursuant to Indiana Code section 27-1-3.1 et seq.
7. Respondent agrees, for a period of one (1) year, to provide quarterly reports to the Department summarizing Respondent's annuity business transactions beginning as of January 1, 2009. Said quarterly reports will report, with sufficient detail, all annuity business transacted by Respondent in the preceding months, the first of which will be due on January 1, 2009. Said quarterly reports will be provided in a spreadsheet format, and will including the following information: date of the annuity application, type of annuity (e.g. variable annuity, equity indexed annuity, fixed annuity, etc.), a brief description of the product or product name, the contract or policy number, the amount of the annuity, the insurance company issuing the annuity, the last name of the annuitant and owner, the age of the annuitant and owner, a brief statement of whether the annuity was a replacement annuity, and if so, what product the annuity was replacing, and whether a

suitability analysis was conducted prior to the sale. Each subsequent report will be provided ninety (90) days after the previous report.

8. Respondent agrees to provide the Department twelve (12) consecutive, monthly reports listing all the senior seminars conducted by either Respondent and/or Vineyard Financial, Inc. beginning with January 1, 2009. Said report will provide the following information: name or title of the seminar, the date of the seminar, the address of where the seminar will be conducted, a brief description of the topics to be covered during the seminar, and a copy of any applicable mailing, invitation, or other advertising materials used for the purpose of attracting seminar attendees. Said report will be provided at least fifteen (15) days prior to the date of the seminar, the first of which will be provided on January 1, 2009. Each subsequent report will be provided thirty (30) days after the previous report.
9. The Department agrees to accept Respondent's compliance with the terms of this Agreed Entry as full resolution of all matters contained herein.
10. The Department agrees that any annuity complaint received during the period set forth in paragraph seven (7) will not result in automatic discipline to Respondent's license simply based on the fact that an additional annuity complaint has been received.
11. Respondent agrees that he has carefully read and examined this Agreed Entry, and fully understands that failure to comply with the terms of this Agreed Entry will result in this matter being set for a final administrative hearing to resolve all the matters set forth herein.
12. Respondent has been represented by counsel throughout this matter.



Bradley Ford
Respondent

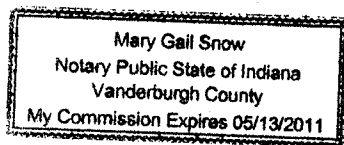


Lisa Harpenau
Attorney
Indiana Department of Insurance

STATE OF INDIANA)
COUNTY OF Vanderburgh) SS:

Before me a Notary Public for Vanderburgh County, State of Indiana, personally appeared Bradley Ford and being first duly sworn by me upon her oath, says that the facts alleged in the foregoing instrument are true.

Signed and sealed this 14 day of October, 2008.



Mary Gail Snow
Signature

Mary Gail Snow
Printed

My Commission expires: 5/13/2011

County of Residence: Vanderburgh

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